

**In the United States District Court
For the Southern District of Texas
Houston Division**

**Travelers Casualty and
Surety Company of America,**
Plaintiff,

v.

**PRCHOU, LLC, Mukadas D.
Kurban, Apar Pataer, Abdul R.
Dawood, and Maria E. Dawood**
Defendants.

Case No. 4:24-cv-00796

Dawood Defendants Provisional Joinder in Response to MSJ (Dkt. No. 35)

Defendants Abdul R. Dawood and Maria E. Dawood (the “Dawood Defendants”) file this Provisional Joinder in Co-Defendants PRCHOU, LLC, Mukadas D. Kurban, and Apar Pataer’s Response to Motion for Summary Judgment of Plaintiff and Brief in Support and Objections to Summary Judgment Evidence (“Response to MSJ (Dkt. No. 35)”).

Concurrently with this Provisional Joinder, Defendants filed their Unopposed Motion for Enlargement of Time Regarding Motion for Summary Judgment of Plaintiff and Brief in Support (Dkt. No. 31) to request that: 1) Defendants have a one-week extension until July 14, 2025 to file their response(s) to Plaintiff’s motion for summary judgment (Dkt. No. 31) and 2) Plaintiff have a corresponding one-week extension until July 21, 2025 to file any reply(ies) in support of said motion for summary judgment (Dkt. No. 31).

If, and only if, the Court denies the above-described unopposed motion for the enlargement of the response and reply deadlines related to Plaintiff's motion for summary judgment (Dkt. No. 31), do the Dawood Defendant's hereby join their Co-Defendants' Response to MSJ (Dkt. No. 35) for all purposes. And for the reasons stated in Response to MSJ (Dkt. No. 35), the Dawood Defendants respectfully request that the Court deny the Motin for Summary Judgment of Plaintiff and Brief in Support in its entirety and grant the Dawood Defendants all other relief to which they are justly entitled.

Respectfully Submitted,

Meade Neese & Barr LLP

/s/ D. John Neese, Jr.

D. John Neese, Jr.

State Bar No. 24002678

2118 Smith Street

Houston, Texas 77002

(713) 355-1200

jneese@mnbllp.com

Attorneys for the Dawood Defendants

Abdul R. Dawood and

Maria E. Dawood

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by electronic service on July 7, 2025.

/s/ D. John Neese, Jr.

D. John Neese, Jr.